To: Rumrill, Nancy[Rumrill.Nancy@epa.gov]

Cc: Rao, Kate[Rao.kate@epa.gov];

Shari.Ring@cadmusgroup.com[Shari.Ring@cadmusgroup.com]

From: JAMES D WALKER

Sent: Wed 8/30/2017 5:20:15 AM

Subject: Responses to Excelsior comments on the Gunnison Draft Perimit.

Gunnison ISCR project draft permit 8-22-2017-jw 8-28-17.docx

; Hi Nancy,

My responses and recommendations regarding Excelsior comments and suggested revisions are provided in the attached Excelsior version of the draft permit. Where I do not reply or comment on an Excelsior change in the text, I considered those revisions acceptable.

There are several critical issues to be resolved with Excelsior and/ or clarified in the permit. Excelsior expectation of ISR fluid sweep at the outer OWs is one of them. The need for additional active HC wells and OWs to monitor and ensure hydraulic control in the early years is another concern.

When would be a convenient time to discuss these comments and responses in preparation for the call on Thursday?

Thanks,

Jim